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November 2, 2005

Mr. John F. Carter Regional Director Federal Deposit Insurance Corporation 25 Jessie Street at Ecker Square, Suite 2300 San Francisco, California 95105

Re: Comments Regarding FDIC Application #20051977; Wal-Mart Application for Insurance and Industrial Bank Charter

Dear Mr. Carter:

I am writing to oppose the application of Wal-Mart Stores, Inc., for Federal deposit insurance coverage for an ILC Charter in Utah. I am a community banker and believe strongly that allowing Wal-Mart to own a bank charter and potentially open branches in its network of stores would do irreparable harm to my community and my institution, and pose a severe systemic risk to our nation's economy.

The stated intentions of Wal-Mart to use the limited ILC Charter for card transactions is only, in reality, a first step into retail banking in my opinion. Once the entry into banking has been established, the next corporate initiative could easily be to expand its reach to its customers throughout the Wal-Mart chain of stores. Wal-Mart has been successful in communities across the country by pricing its competition out of business. I don't believe our communities will be better served by the elimination of community banks as a result of a commercial firms entry into banking and the concentration of financial resources.

Congress has reaffirmed our nation's long-standing policy against the mixing of banking and commerce, and with good reason. Mixing banking and commerce would create serious conflicts of interest and distort credit decisions. The impartial allocation of credit is the linchpin of our financial system and must be preserved. Would a Wal-Mart Bank offer credit at reasonable terms to its competitors? Would Wal-Mart require its suppliers to bank at the Wal-Mart bank?

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For the sake of the community banks of our nation and the customers and communities we serve, please do not allow Wal-Mart to get into the banking business. Make a statement for fair competition and consumer choice by denying Wal-Mart's application for deposit insurance.

Sincerely,

Frank A. Suellentrop

President

FAS:cw